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15 *Attorneys for Defendant Google LLC*

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 CHASOM BROWN, WILLIAM BYATT,
20 JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
21 individually and on behalf of all similarly
situated,

Case No. 5:20-cv-03664-LHK-SVK

[PROPOSED] ORDER LIMITING
ONGOING DISCOVERY

Referral: Hon. Susan van Keulen, USMJ

22 Plaintiffs,

23 v.

24 GOOGLE LLC,
25 Defendant.

[PROPOSED] ORDER

Before the Court is the parties' Joint Discovery Submission. Having considered the parties' statements and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

- Absent a showing of good cause, each party shall be limited to 25 interrogatories as provided by Federal Rule of Civil Procedure 33. Discrete subparts shall each be counted as a separate interrogatory. To the extent a party has propounded more than 25, it will identify unanswered interrogatories to be answered such that the total number of interrogatories does not exceed 25 interrogatories (including discrete subparts). The other interrogatories will be considered withdrawn.
 - Absent a showing of good cause, each party shall be limited to 60 Requests for Admission.
 - The parties agree to meet and confer in good faith should Plaintiffs wish to serve any additional Request for Production of Documents, and seek Court intervention in the event they reach an impasse.
 - Google shall only produce last-in-time emails, which shall include all versions of an email thread with unique information.
 - The parties agree to meet and confer in good faith should Plaintiffs wish to seek any additional, targeted search terms, and seek Court intervention in the event they reach an impasse.
 - The parties agree to meet and confer in good faith concerning a timeline for any Requests for Production that were propounded, or where responses and objections were served, after the August 12, 2021 discovery hearing, and seek Court intervention in the event they reach an impasse.
 - Any challenges to a document that appears on any party's privilege log shall be stayed until October 20, 2021.
 - Google shall produce any privilege log for documents subject to the October 6, 2021 substantial document production deadline no later than November 17, 2021.

1 **SO ORDERED.**
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3 DATED: _____
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HON. SUSAN VAN KEULEN
United States Magistrate Judge